

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

No. 12-md-2323 (AB)

MDL No. 2323

THIS DOCUMENT RELATES TO:

Plaintiffs' Master Administrative Long-
Form Complaint and:

Reginald Rucker, et al. v. National Football
League, et al.

Court File No. 2:12-cv-1036-AB

**MOTION FOR LEAVE TO
WITHDRAW AS COUNSEL
FOR PLAINTIFFS JAMES ROURKE
AND CAROL ROURKE**

Charles S. Zimmerman, J. Gordon Rudd, Jr., and Brian C. Gudmundson of Zimmerman Reed, P.L.L.P. ("Plaintiffs' Counsel"), move this Court pursuant to Pennsylvania Rule of Professional Conduct 1.16(b)(1) and United States District Court for the Eastern District of Pennsylvania Local Rule of Civil Procedure 5.1(c) to withdraw as counsel in relation to the claims of James Rourke and Carol Rourke only in this action, and state as follows:

1. Plaintiffs' counsel filed the action *Reginald Rucker, et al. v. National Football League, et al.*, No. 11-cv-9538, in the Southern District of New York on December 27, 2011, for the benefit of several retired National Football League players, including James Rourke and Carol Rourke. It was thereafter transferred to the Eastern District of Pennsylvania as No. 2:12-cv-1036-AB.

2. Plaintiffs' counsel filed a short form complaint for Plaintiffs James Rourke and Carol Rourke on July 13, 2012.

3. Since then, irreconcilable differences have arisen between Plaintiffs James Rourke and Carol Rourke and the undersigned.

4. Plaintiffs' counsel properly notified James Rourke and Carol Rourke of counsel's intention to withdraw from representing them in this matter.

5. Under the circumstances, it is apparent that the undersigned must move the Court for leave to withdraw as counsel.

WHEREFORE, Plaintiffs' counsel respectfully requests this Court for leave to withdraw as counsel for James Rourke and Carol Rourke only in Court File No. 2:12-cv-1036-AB.

Dated: June 10, 2015

Respectfully submitted,

ZIMMERMAN REED, P.L.L.P.

s/ Brian C. Gudmundson

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